UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL 2327

THIS DOCUMENT RELATES TO ALL CASES

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

AMENDED CROSS NOTICE OF VIDEO DEPOSITION OF DANIEL J. CHRISTENSEN

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the deposition of DANIEL J. CHRISTENSEN will be taken jointly in connection with *In Re American Medical Systems, Inc. MDL No. 2325*, *Pelvic Repair System Products Liability Litigation*, upon oral examination on January 23, 2014, at 10:00 a.m. EST, at 701 Brazos Street, Suite 420, Austin, Texas.

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in *In Re American Medical Systems, Inc. MDL No. 2325, Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer oaths and video-taped.

Dated: January 15, 2014

Respectfully submitted,

/s/Christy D. Jones
Christy D. Jones
BUTLER SNOW LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523
Christy.jones@butlersnow.com

/s/ David B. Thomas_

David B. Thomas (W.Va. Bar #3731) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 25338 (304) 414-1807 dthomas@tcspllc.com

COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/Christy D. Jones
Christy D. Jones

ButlerSnow 18985125v1